

UNITED STATES DISTRICT COURT

for the

District of Massachusetts

Tamesha Bowers

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

- 1) Department of Children/Families
- 2) Judge George Phelan
- 3) Quincy Police Department
- 4) Edison/Ronald Cross

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No. _____

(to be filled in by the Clerk's Office)

Jury Trial: (check one) ☐ Yes ☐ No

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address

Tamesha BowersDepartment of Children/FamiliesArboretum Road (near) 31 Neponset AvenueBostonMA, 02122857-762-9228Tamesha.Bowers19@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

DCF: Alexis Lamb, Fern Ellis / Beth Terri (supervisor)
Case Worker, investigator / supervisor
Forbes Rd
Braintree
MA

Defendant No. 2

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

Judge George Phelan
Judge
35 Shawmut Rd, CA
Canton
MA 02021
781-886-1200

Defendant No. 3

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

Quincy Police Department
~
1 Dennis Ryan Pkwy
Quincy
MA 02169
617-471-1650

Defendant No. 4

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

Edison Cross / Ronald Cross
Hotel / Unemployed
77 Baxter Avenue
Quincy
MA 02169

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*



Federal question



Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

*VIOLATION OF CIVIL RIGHT
VIOLATION OF 5th/14th amendment RIGHTS*

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)**

N/A

a. If the plaintiff is an individual

The plaintiff, *(name)*

, is a citizen of the

State of *(name)*

b. If the plaintiff is a corporation

The plaintiff, *(name)*

, is incorporated

under the laws of the State of *(name)*

and has its principal place of business in the State of *(name)*

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, *(name)*

, is a citizen of

the State of *(name)*

. Or is a citizen of

(foreign nation)

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under
 the laws of the State of (name) _____, and has its
 principal place of business in the State of (name) _____.
 Or is incorporated under the laws of (foreign nation) _____,
 and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy-the amount the plaintiff claims the defendant owes or the amount at stake-is more than \$75,000, not counting interest and costs of court, because *(explain)*:

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 2/24/2020

Signature of Plaintiff

Printed Name of Plaintiff



Tamesha Brown

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

- Violated my Daughter and Amendment Right
- Deemed me Neglected of my child without (9/14/19) fitting the Definition But added to the Definition
- Neglect filed against Mother for violence in front of Child
- Neglect unsupported against Dad, But records prove Dad was violent to Mother in front of child
- Bias findings of Neglect, Mother (writer) is a Black poor woman. Father is a middle class white male with attorney.
- requested mom has supervised visits with child But Dad has no restrictions although on 8/13/19 DCF Documented Dad was in the care giver Rute High
- Denied twice to change worker
- Defamation of character

Relief:

- To compensated for pain, suffering and Defamation of character \$50,000
- To Be compensated for Emotion Distress of Me and my child
- To Be compensated for loss wages
- To have my worker switched
- To have DCF respect my Daughter and I Rights and not intervene in our relationship/family
- Compensation of \$75,000

U.S. DISTRICT COURT
DISTRICT OF MASS.

202 FEB 24 AM 11:32

FILED
IN CLERKS OFFICE

Doc# 19W0560

Judge George Phelan Defendant
Date of Hearing: 2/20/2020
Time: 9:30 AM
Courtroom: 4

Judge stated it will be a while before I get my child back although I completed probate requirements

1) On 2/20/2020 Judge Phelan session, The Judge covering never stated his name on the record. I had to ask a court officer his name and I was told Judge

2) Treated writer (Tamesha Owens) demonstrably egregious in a hostile manner

3) Deprived me from my child violating our 5th and 14th Amendment Rights

4) Discrimination. The Judge stated to writer "I have a problem with everybody" but had assumed me and wasn't deemed the problem before the hearing was complete

5) Interference or failure to comply with complaint process

6) Making public comment on pending case or which shows prejudice

7) Relief

1) To remove Judge off my case due to bias

2) To have Judge respect our 5th and 14th Amendment Rights

3) To have my child removed off the order

4) To transfer case to Boston

5) To respect my daughter and I right

6) To maintain relationship without state interference

6) Compensation for pain, suffering and violation of Rights 75,000

Quincy Police Department, Sgt. Brian Flerty, Steve Clorie
Case 1:20-cv-00391-FJS Document 1 Filed 02/27/20 Page 8 of 9
Chief John Dugan, Dispatcher Trish, Officer First Name
Amanda (Defendants) ③

- false reporting of neglect against mom 11/18/19 was screened out
- Denied Wellness Check of a child
- Discrimination Due to Race/Class
- Wrongful arrest when called for wellness check
- false inaccurate reporting
- Violation of 42 U.S. Code § 1983. Civil action for deprivation of Rights
- Harassment

- Dishonesty
 - Coercion
 - Abuse of authority
 - Created issue to increase the likelihood of a wrongful conviction
 - Contributing to systematic misconduct
 - Refusal to investigate child endangerment reports
 - Refusal to protect and serve
 - Refusal to take report which is against my civil rights
 - Actions violated my 5th and 14th Amendment Rights
- Relief

- ① All parties held accountable for actions
- ② Compensation of \$5,000 for pain and suffering due to discrimination and unfair treatment
- ③ To have my rights respected
- ④ To have my child removed from the town of Quincy to a place with her peers, where my child's safety and civil rights are respected
- ⑤ To have reports corrected or removed
- ⑥ Compensation for Defamation of character and Malice intent

- On 8/12/19 There was no restraining order in place. I went to pick up my Daughter Ronald Cross called the police so I couldn't pick up my child (essentially kidnapping my child)
 - Deprived me from my child and property violation of my Daughter and I 5th & 14th Amendment Rights
 - Took away a car that was Brought for my Daughter and I
 - Held my child and property away from me with malice intent
 - Defamation of Character
 - Accused me of Being abusive with no facts
 - Called me and my child Racial slurs
 - Constantly used Police as a weapon call numerous times for no crime
-
- Relief
- Compensation for pain and suffering 75,000
 - Malice Intent
 - return of vehical or to pay the cost of purchasing a new one 11,000
 - To return my Daughter and I Belongings
 - To respect my Daughter and I civil and Constitutional Rights
 - To return all mail and personal Belongings
 - The cost of new furniture for my Daughter and I totaling \$1,970.97
 - loss wages from Dec 6 until 2/24/20 at 22.33hrly